

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	Violations: Title 18, United States
)	Code, Section 1344 and
JEFFREY SUSPENZI)	Title 26 United States Code,
)	Section 7206(1)
)	

COUNT ONE

The UNITED STATES ATTORNEY charges:

1. At times material to this indictment:

(a) Parkway Bank and Trust Company, Harwood Heights, Illinois ("Parkway Bank"), was a financial institution the accounts of which were insured by the Federal Deposit Insurance Corporation.

(b) Individual A was an account holder and had one or more lines of credit established at Parkway Bank.

(c) Defendant JEFFREY SUSPENZI was an Assistant Vice-President and the account supervisor for Individual A at Parkway Bank.

2. Beginning no later than on or about December 11, 2000, and continuing at least through June 28, 2001, in the Northern District of Illinois, Eastern Division,

JEFFREY SUSPENZI,

the defendant herein, knowingly devised and participated in a scheme to defraud a financial institution and to obtain moneys, funds, and credits owned by and under the custody and control of Parkway Bank by means of materially false and fraudulent pretenses,

representations, and promises, in violation of Title 18, United States Code, Section 1344.

3. It was part of the scheme that in or about the spring of 2001, defendant JEFFREY SUSPENZI caused Individual A's lines of credit to be consolidated and increased from \$1 million to \$1.5 million, by persuading Individual A that the credit lines should be consolidated and increased for business purposes when in reality JEFFREY SUSPENZI wanted Individual A's credit lines consolidated and increased in order to embezzle money from Individual A's credit line at Parkway Bank..

4. It was further part of the scheme that defendant JEFFREY SUSPENZI caused withdrawals to be made from Individual A's line of credit at Parkway Bank, without Individual A's knowledge or permission, in the form of cashier's checks made payable to Individual A on or about the following dates and for the following amounts:

<u>Date</u>	<u>Check #</u>	<u>Amount</u>
December 11, 2000	60289	\$8,000.00
December 19, 2000	60348	9,000.00
February 6, 2001	60755	30,000.00
February 13, 2001	60796	20,000.00
March 5, 2001	60946	38,235.00
March 19, 2001	61049	18,240.00
March 22, 2001	61064	44,788.38
April 20, 2001	61267	103,168.17
April 20, 2001	61261	1,200.13

April 20, 2001	61262	3,002.85
April 20, 2001	61263	216.23
April 30, 2001	61324	35,000.00
May 7, 2001	61401	45,000.00
May 15, 2001	61465	29,000.00
May 17, 2001	61474	28,740.00
June 18, 2001	61734	11,000.00
June 22, 2001	61830	44,000.00
June 28, 2001	61778	<u>26,127.00</u>
Total		\$497,717.66

5. It was further part of the scheme that defendant JEFFREY SUSPENZI signed his own name on each of the fraudulently issued cashier's checks made payable to Individual A as the authorizing bank official.

6. It was further part of the scheme that defendant JEFFREY SUSPENZI forged Individual A's endorsement on the back of the cashier's checks and endorsed them again with his own signature.

7. It was further part of the scheme that defendant JEFFREY SUSPENZI negotiated the checks and caused Parkway Bank to provide him the money from Individual A's line of credit for personal use.

8. It was further part of the scheme that in order to conceal his fraudulent and unauthorized withdrawals, defendant JEFFREY SUSPENZI made interest payments to

Parkway Bank based upon the above withdrawals.

9. It was further part of the scheme that in order to conceal his fraudulent and unauthorized withdrawals, defendant JEFFREY SUSPENZI prevented Parkway Bank employees from sending account statements to Individual A for his consolidated line of credit.

10. It was further part of the scheme that defendant JEFFREY SUSPENZI misrepresented, concealed, hid and caused to be misrepresented, concealed, and hidden, the purposes of and acts done in furtherance of the scheme.

11. On or about April 20, 2001 defendant JEFFREY SUSPENZI knowingly executed and attempted to execute the above-described scheme by causing the issuance of Parkway Bank cashier's check #61267, in the amount of \$103,168.17, which check defendant fraudulently caused to be funded with an unauthorized withdrawal from Individual A's line of credit;

In violation of Title 18, United States Code, Section 1344.

COUNT TWO

The UNITED STATES ATTORNEY further charges:

On or about June 14, 2001, in the Northern District of Illinois, Eastern Division,

JEFFREY SUSPENZI,

defendant herein, who during the calendar year 2000 was a resident of Palatine, Illinois, willfully did make and subscribe, and caused to be made and subscribed, a United States Individual Income Tax Return (Form 1040 with schedules and attachments) for the calendar year 2000, on behalf of himself and his wife, which return was verified by a written declaration that it was reviewed and made under penalties of perjury and was filed with the Internal Revenue Service at the Kansas City Campus, Kansas City, Missouri, which return he did not believe to be true and correct as to every material matter contained therein, in that it stated at Line 22 that JEFFREY SUSPENZI and his wife had total income of \$261,922.00, whereas in truth and fact, as defendant well knew and believed, his total income was substantially greater than \$261,922.00 in calendar year 2000;

In violation of Title 26, United States Code, Section 7206(1).

COUNT THREE

The UNITED STATES ATTORNEY further charges:

On or about July 8, 2002, in the Northern District of Illinois, Eastern Division, and elsewhere,

JEFFREY SUSPENZI,

defendant herein, who during the calendar year 2001 was a resident of Palatine, Illinois, willfully did make and subscribe, and caused to be made and subscribed, a United States Individual Income Tax Return (Form 1040 with schedules and attachments) for the calendar year 2001, on behalf of himself and his wife, which return was verified by a written declaration that it was reviewed and made under penalties of perjury and was filed with the Internal Revenue Service at the Kansas City Campus, Kansas City, Missouri, which return he did not believe to be true and correct as to every material matter contained therein, in that it stated at Line 22 that JEFFREY SUSPENZI and his wife had total income of \$115,852.00, whereas in truth and fact, as defendant well knew and believed, his total income was substantially greater than \$115,852.00 in calendar year 2001;

In violation of Title 26, United States Code, Section 7206(1).

UNITED STATES ATTORNEY